

Response under 37 C.F.R. § 1.116
U.S. Application No. 09/680,283

Attorney Docket No. Q60971

REMARKS

Claims 1-18 are all the claims pending in the application.

The Examiner maintained the rejection of claims 1-18 under 35 U.S.C. § 103(a) as being unpatentable over De Zen et al. "Value-added Internet: a pragmatic TINA-based path to the Internet and PSTN Integration" Global Convergence of Telecommunications and Distributed Objected Computing Proceedings, November 17-20, 1997 (hereinafter "Zen") in view of Manione et al., "A 'TINA Light' Service Architecture for the Internet-Telecom scenario," Telecommunications Information Networking Architecture Conference Proceedings, April 12-15, 1999 (hereinafter "Manione").

In response to Applicant's arguments, with respect to Zen, the Examiner alleges that "Zen suggest the user of CORBA and Java technology on the Web server side in an effort for the support of interaction between the Web server and the web browser via the SISTINA server (= SISTINA retailer) [see Zen, Figs. 1-2 and Sec. 2.3]; this implies that there is a user of servlet as a Java program running on the Web server" (see pages 21 to 22 of the Office Action). Applicant respectfully disagrees and respectfully requests the Examiner *to carefully reconsider* this rejection. Applicant respectfully submits that this implication is incorrect as a technical matter.

Zen teaches a theoretical concept of integrating the Internet with a PSTN using TINA (see *Abstract*). In particular, Zen teaches an end user, a retailer, and a third party service provider. The retailer is SISTINA, which in addition to TINA functionality, provides additional benefits of session control, guaranteed quality of service, etc. (Fig. 1; § 2.0). In particular, Zen teaches that the end user must download additional Java software in order to make his browser

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TINA capable. This software must be downloaded to incorporate Java CORBA client for functional interaction (§ 2.1). That is, Zen fails to teach or suggest not needing to install additional software on the browser but simply having a servlet transmit an applet that will TINA enable the user browser.

In response to the Examiner's implication that since Zen teaches using CORBA and Java technology, this implies having a servlet running on the Web server. As explained in the Amendment under 37 C.F.R. § 1.111 filed on April 15, 2004, Zen could be using a Java implemented wrapper process and not a servlet. This wrapper process often communicates using a socket to connect with an applet. Moreover, Zen teaches using CORBA, which is a distributed object broker architecture that requires establishment of interorb links (using inter-object request broker). CORBA tool uses an IDL file to create stubs and skeletons, which serve as proxies for clients and servers because IDL defines interfaces very strictly so that the stubs on the client side will not have a problem meshing perfectly with the skeleton on the server side. This, however, causes problems for maintenance and development especially over the network boundaries. CORBA is impractical for a portal for services because portals need to be reconfigurable.

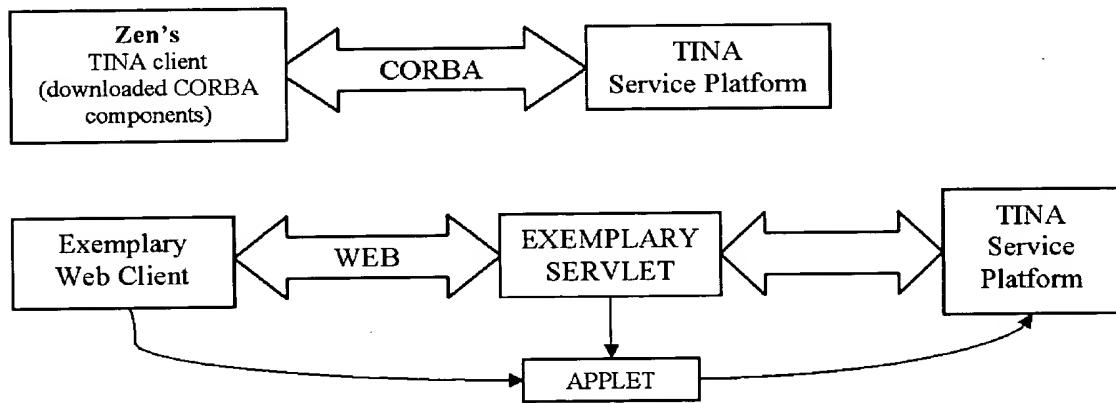
Furthermore, even assuming *arguendo* that Zen teaches having a servlet on the server side, Zen fails to teach or suggest having the servlet detect whether or not certain browser session is associated to a related service session and if said certain browser session is not associated to said related service session and returning a web-page containing an applet to guide an associated browser of the user through a logon process for said related service session, as set forth in claim 1.

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Specifically, in Zen, once the software is installed in order to TINA enable user browser, the user may initiate a TINA service session. That is, Zen teaches having a service request being sent from the user to the dedicated component of TINA service architecture and the appropriate service provider is selected by the TINA service platform. The connection between the user and the selected service provider is established on the basis of the request coming from a retailer component of the TINA service platform. In other words, Zen teaches having a dedicated connection between the TINA service platform and the user browser via CORBA.

Zen fails to teach or suggest having a servlet installed at the web-server for the provider to start a service session and associate it with certain URLs via a database. That is, in the exemplary, non-limiting embodiment, this servlet serves as somewhat of a proxy for enabling user browser to use TINA and guiding the user through a logon process. By way of an example, the following diagram may be helpful to illustrate the differences between Zen and the servlet in accordance with the exemplary embodiment of the present invention.



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In short, in Zen, CORBA components have to be downloaded into the browser to enable the browser to use TINA. The user browser communicates via this downloaded CORBA with TINA service platform to obtain the benefits of SISTINA retailer. Zen fails to teach or suggest:

installing a servlet at a web-server of a content provider having access to said service platform and detecting by said servlet whether or not said certain browser session is already associated to a related service session... and

if said certain browser session is not associated to said related service session, returning a web-page containing an applet to guide an associated browser of the user through a logon process for said related service session...

Moreover, Manione does not cure the deficient teachings of Zen. Manione teaches integrating traditional telecommunications and the Internet using a simplified TINA. In particular, Manione teaches combining the provider and the retailer to simplify the structure of TINA (see *Abstract*). In Manione, one single Java native ORB may be used through the entire platform. Specifically, Manione teaches using an active UAP and a static UAP in the user domain (§ 2.B, pages 25-26). The active UAPs are regular computational objects and the static UAP may be a set of HTML pages, with optional JavaScript extensions. UAP Backend procedures (e.g. servlet or CGI) support such mechanism (§ 3.A, pages 26-27).

With respect to Manione, the Examiner alleges that Manione discloses a servlet at a web-server of a provider/retailer domain having access to the service platform and interacting with the browser on the User Domain side (Java UAP) for session services such as event logging and

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session managing and as such is equivalent to the servlet set forth in claim 1 (see page 22 of the Office Action). Applicant respectfully disagrees.

Manione is no different from Zen. Manione suggests active UAPs that require: a) download of Java software for service, b) Java-CORBA interface, and c) tight CORBA binding. With respect to static UAPs, Manione simply states that static UAPs could be implemented by scripts or servlets.

Manione, however, fails to teach or suggest how the Java service object could use the session information. That is, Manione does not teach or suggest providing central authentication via a guided servlet entry. In other words, Manione fails to teach or suggest using the static UAPs to return a web-page containing an applet that guides an associated browser of the user through a logon process for said related service session when the browser session is not associated to the related service session.

In short, Manione teaches only Java applets via ORB for active UAP and downloaded web pages via servlets for static UAP. Manione, however, fails to teach or suggest using the session information to provide a central authentication via a guided servlet entry. That is, Manione fails to teach or suggest having an applet that would guide the associated browser of the user when the browser session is not associated to the related service session. In short, Manione does not cure the deficient teachings of Zen.

Therefore, detecting by the servlet at the web-server whether or not a certain browser session is already associated to a related service session and returning a web-page containing an applet to guide an associated browser of the user through a logon process for the related service

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session as set forth in claim 1, is not taught or suggested by the combined teachings of Zen and Manione. For at least these exemplary reasons, Applicant respectfully submits that claim 1 is patentable over the combined teachings of Zen and Manione. Applicant therefore respectfully requests the Examiner to withdraw this rejection of claim 1. Claims 2-10 are patentable over the combined teachings of Zen and Manione at least by virtue of their dependency on claim 1.

Independent claims 11 and 17 contain features that are similar to the features argued above with respect to claim 1. Therefore, arguments presented with respect to claim 1 are respectfully submitted to apply with equal force here. For at least analogous exemplary reasons, therefore, Applicant respectfully requests the Examiner to withdraw this rejection of independent claims 11 and 17. Claims 12-16 are patentable at least by virtue of their dependency on claim 11.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

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Respectfully submitted,



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23373
CUSTOMER NUMBER

Date: February 15, 2005